4.8 PUBLIC SERVICES

This section addresses the capacity of locally provided and funded fire protection and emergency response services that would respond to emergency situations at the EMT. This section also assesses the impacts of the proposed Project and Alternatives on these services and capabilities.

A detailed analysis of the risks of fires, explosions, and oil spills is presented in Section 4.2, Hazards and Hazardous Materials, along with an evaluation of the effectiveness of Venoco's contingency planning.

4.8.1 Environmental Setting

The Environmental Setting discusses the capacity of the Santa Barbara County Fire Department (SBCFD) and Office of Emergency Services (OES) to respond to incidents at the EMT. This section also describes Venoco's fire protection and emergency response systems and equipment at the EMT.

Fire Protection and Emergency Response

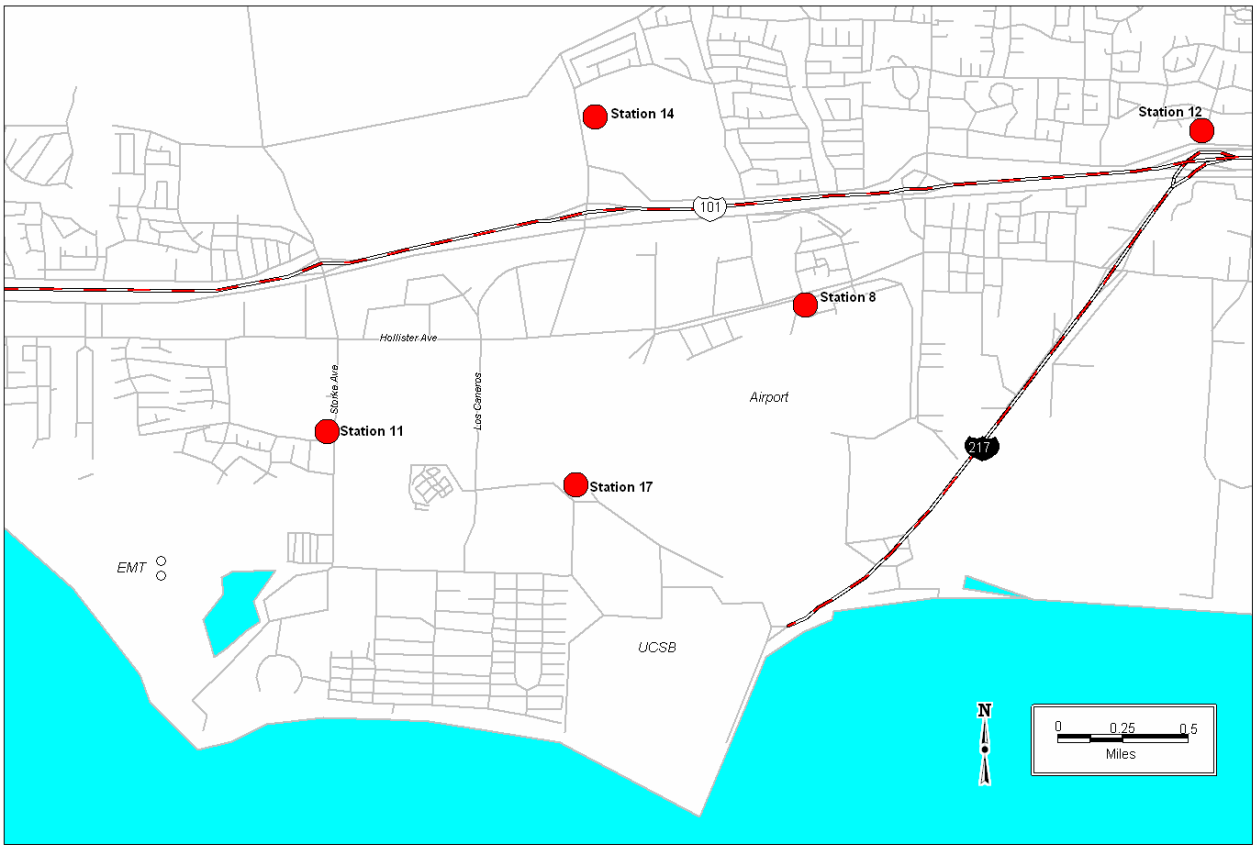
The SBCFD provides fire protection services to the project area. The SBCFD serves an area of approximately 2,700 square miles (6,993 square kilometers [km^2]) and includes the incorporated sections of the County. The SBCFD has 15 fire stations. In general, all firefighters are trained as emergency medical technicians (Santa Barbara County 2004).

Criteria used by the SBCFD to determine adequacy of fire protection services include: a five-minute response time, ratio of firefighters to population, and the population served. The five-minute response time is considered the most critical criterion in providing prompt urban fire protection. The five-minute response standard is used for urban areas, and refers to the time it takes for a unit to reach a call and set up equipment after leaving the station. Response times under five minutes are considered adequate and over five minutes are substandard. Rather than applying these standards to specific service territories as has been done in the past, the SBCFD currently approaches fire protection on a more system-wide basis and will shift resources to respond to calls as needed. All of the SBCFD's vehicles and equipment are considered shared resources (Santa Barbara County 2004).

In the past, the SBCFD has tried to follow a standard of one three-person station per 1,200 residents, or one five-person station per 1,500 residents. All fire stations serving the project area meet or exceed this ratio (Santa Barbara County 2004).

The OES is a division of the SBCFD, and is responsible for emergency planning and coordination for the Santa Barbara Operational Area. OES staff act as support staff to the SBCFD when "expanded dispatch" is activated during a fire or other emergency within the County. Expanded dispatch serves as a central ordering point and coordination link for firefighters battling wildland fires or other major incidents. Stations Number 11, 17, and 14 (refer to Figure 4.8-1) currently provide service in the project area (Santa Barbara County 2004).

Figure 4.8-1
Fire Station Locations



The SBCFD response to a fire or emergency incident at the EMT would be three engine companies, a truck company, and a Battalion Chief. The first-on-the-scene engine Captain would evaluate the situation and call or cancel resources depending on the size of the incident. The equipment would include the engine and truck companies from

Station 11, the engine company from Station 17, and the engine company from Station 14 (Magallanes 2005).

The station closest to the project site is Station 11. Station 11 is located on Storke Road approximately 1 mile (1.6 km) from the EMT. Station 11 maintains a 1,500-gallon-per-minute (5.7-meter^3 [m^3] per-minute) pumper unit, a truck company, and water rescue equipment. Station 11 is staffed with six firefighters who are trained as emergency medical technicians, and one is also a paramedic (Santa Barbara County 2004).

Station 17, located approximately 2 miles (3.2 km) from the EMT, is the next closest fire station. Station 17 is staffed with three firefighters who are trained as emergency medical technicians. Station 17 is also the home station for University of California, Santa Barbara (UCSB) Rescue 7, which is staffed by one paramedic and one student emergency medical technician. UCSB Rescue 7 is not part of SBCFD. Response time from Station 17 to the project area is approximately five minutes. Station 17 maintains a 1,500-gallon-per-minute (5.7 m^3 per-minute) pumper unit, a reserve truck company, and an ambulance (UCSB 2004).

Station 14 on Los Carneros Road, approximately 2.5 miles (4 km) from the project site, maintains one fire engine and is staffed with three firefighters who are also trained as emergency medical technicians. Response time to the EMT is approximately six minutes (Magallanes 2005).

Station 12 is a little more than 4 miles (6.4 km) from the EMT. This station is equipped with one engine and is staffed by three firefighters. Station 12 would be called on a second alarm and is approximately seven to eight minutes from the EMT (Magallanes 2005).

City of Santa Barbara Station 8 is located approximately 2.5 miles (4 km) from the EMT and is a dedicated airport rescue station with only “crash truck” response apparatus. Station 8 cannot respond to incidents offsite unless the Santa Barbara Airport Authority grants permission (Magallanes 2005).

Ellwood Marine Terminal

In addition to the publicly provided fire protection and emergency response equipment, oil facilities are required by Federal and State regulations to have onsite fire fighting equipment as well as materials to control oil spills or other hazardous materials

releases. Venoco has fire fighting and emergency response capabilities at the EMT in accordance with these regulations. Venoco's ability to prevent, contain, and extinguish fires or resolve emergencies reduces the burden placed on publicly provided and funded fire protection and emergency response services.

Venoco Emergency Management System

All emergency incidents that occur on Venoco property or facilities are managed utilizing an Incident Command System (ICS) consistent with standard Federal and State emergency command structure guidelines. This system provides the capability and flexibility to respond to a wide range of emergency incidents, allows for complete integration with all government agency emergency response organizations, and ensures the proper and efficient response to all emergency incidents.

The Venoco Emergency Management System is a two-tier organization consisting of a corporate Sustained Incident Response Team (SIRT) and a facility-based Initial Incident Response Team (IIRT). Personnel assigned specific positions in the SIRT and IIRT are required to be thoroughly familiar with their roles and responsibilities and to participate in specified training programs and exercises simulating emergency events. Emergency response contractors and Oil Spill Response Organizations are also integrated into this emergency management system. The Venoco Emergency Management System is described in detail in the South Ellwood Field Emergency Action Plan (EAP) (Venoco 1998) and the South Ellwood Field Oil Spill Contingency Plan (OSCP) (Venoco 2005). The primary objectives of the Venoco Emergency Management System are to:

- Maximize personnel safety, protection of the environment, and minimize property damage;
- Mobilize resources to control and contain the incident with rapid, responsible, and effective actions;
- Manage information efficiently for tactical decisions and strategic planning; and
- Maintain a positive relationship with governmental agencies, the media, and the public.

Venoco is a participant of the Santa Barbara County Community Awareness and Emergency Response (CAER) organization as part of the Area Oil and Gas Emergency Plan (Venoco 1998).

Initial Incident Response Team

In the event of an emergency incident, the IIRT will be activated immediately and will provide Venoco's initial response. The Facilities Supervisor heads the IIRT. If an incident occurs when the Facilities Supervisor is not onsite, the Person-In-Charge assumes control of the IIRT pending arrival of the Facilities Supervisor, who will then act as the IIRT Incident Commander. The IIRT consists of all facility personnel onsite at the time of an incident and all other facility personnel who may be available for immediate return (Venoco 2003).

The IIRT Incident Commander works with local agency emergency response organizations' Incident Commanders within a Unified Command structure. The Unified Command formulates tactical and strategic decisions to ensure efficient and effective response to the emergency. Depending on the size and complexity of the incident, the IIRT Incident Commander may expand the response organization to include members of the SIRT as necessary. At any time during the incident, the IIRT Incident Commander may request transfer of command to the SIRT, or the SIRT Incident Commander may formally take command of the incident.

Sustained Incident Response Team

Venoco's SIRT is designed and organized to respond to a major onsite incident or major incident with onsite and offsite consequences. The SIRT is designed to augment and/or expand the capabilities of the IIRT as needed. The degree to which the SIRT is activated is dependent on the nature and size of the incident. A SIRT Command Post is normally designated as the Clean Seas Support Yard in Carpinteria, California (Venoco 1998).

The SIRT is organized into five functional sections: Command, Operations, Planning, Logistics, and Finance. The Command Section is responsible for overall management of the response and includes certain staff functions required to support command function. The Operations Section is responsible for directing and coordinating all offshore, shoreline, and land operations responses to an incident. The Planning Section is responsible for the collection, evaluation, and dissemination of tactical information about the incident. The Logistics Section is responsible for providing all support needs to the response efforts. The Finance Section is responsible for providing financial services (Venoco 2003).

When activated by the SIRT Incident Commander, representatives from the five functional sections of the SIRT will respond to the Command Post within 12 hours of the onset of the event. Emergency response contractors and Oil Spill Response Organizations will respond in accordance with Federal and State requirements and Venoco emergency response plans (Venoco 1998, 2005).

Fire Prevention and Preparedness Plan

Venoco's South Ellwood Facilities Fire Prevention and Preparedness Plan (Venoco 2003) defines the measures that are to be implemented and maintained by Venoco personnel in the event of a fire. The plan contains operational information for the EMT, including safety and fire prevention, detection, and protection systems. This plan is designed to be implemented in conjunction with the South Ellwood Field EAP and OSCP, Emergency Evacuation Plans, and Hydrogen Sulfide (H_2S) Contingency Plans.

The EMT is an unmanned facility that is inspected twice daily and twice nightly. Tank levels are monitored electronically from the Ellwood Onshore Facility control room. During barge-loading operations, there is one person at the EMT, six people on the barge Jovalan, three people on the tug, two people on the assist vessel, and one person on the emergency response vessel, the Penguin (Grieg 2005).

There are two lower explosion level (LEL) detectors located in the EMT pump house that will actuate a local audible alarm. There is also one ultra-violet (UV) detector located in the pump house which will shut down the pumps if a fire occurs. If a fire is detected by Venoco personnel, contract personnel, or the public, the IIRT shall be activated as described in the South Ellwood Field EAP. The Person–In-Charge shall notify the SBCFD via a "911" telephone call and notify other required government agencies and Venoco management as required by the EAP (Venoco 2003).

Numerous portable fire extinguishers are stationed at strategic locations in the EMT. A wheeled, 150-pound (68-kilogram [kg]) Ansul Purple K fire extinguisher is located outside the shipping pump building and lease automatic custody transfer (LACT) unit. Hand-held 30-pound (13.6-kg) Ansul Purple K fire extinguishers are located by each of the stairs leading to the crude tanks, outside the shipping pump building, and inside the control room. There is one carbon dioxide (CO_2) fire extinguisher inside the control room for use against potential electrical fires (Venoco 2003).

The SBCFD and OES, in addition to other agencies, conduct an annual inspection of the EMT facilities under the guidance of the Safety Inspection, Maintenance, and Quality Assurance Program (SIMQAP).

EMT Fire Suppression System Upgrade

Venoco took ownership of the South Ellwood Field operations (Platform Holly, the Ellwood Onshore Facility (EOF), the EMT, and the loading of the barge Jovalan) from ExxonMobil in 1997. As a result of several unauthorized gas releases in 1998 and 1999, the Santa Barbara Air Pollution Control District (APCD) issued Venoco an Abatement Order in April 1999, which, among other things, required a comprehensive safety audit of the South Ellwood Field facilities. The safety audit was conducted jointly by the Systems Safety and Reliability Review Committee (SSRRC) and staff of the CSLC in 1999 and 2000 (Santa Barbara County 2002).

The safety audit of the EMT also required an evaluation of the facility's fire protection systems and inspection of facility equipment. As a result of the fire protection evaluation, improvements to Venoco's fire detection and suppression system were recommended by the SBCFD. Furthermore, during the inspection of EMT equipment, the SSRRC noted that repairs to the fire water tank wall and roof were needed. The SBCFD included these deficiencies as three separate requirements in the findings for the SSRRC/CSLC comprehensive safety audit (Santa Barbara County 2002).

Lack of fire detection and fire suppression systems at the two crude oil storage tanks were identified as Priority 2 (medium-high) deficiencies in the findings of the 1999–2000 safety audit. The repairs to the fire water tank were identified as a Priority 4 (low) deficiency. Priority 2 deficiencies are those that could have a moderate potential for injury, oil spill, other adverse environmental impact, or property damage, if operation of facility or equipment in its present condition continued. Priority 4 deficiencies are those that have a low potential for injury, oil spill, other adverse environmental impact, or property damage, if operation of the facility or equipment in its present condition continued (Santa Barbara County 2002).

The upgrade involved the addition of minor structural components to the existing EMT facilities. These provide the means for sustained fire fighting using a foam/water mix in the event of a fire in either or both crude-oil storage tanks. Major project components included:

- Installation of fire-detection wiring around perimeters of crude-oil tanks;

- Installation of an asphalt concrete pad and driveway loop for fire truck access to fire water tank;
- Modification of the existing fire water tank manifold;
- Repair or replacement of the upper sections of the fire water tank;
- Replacement of a segment of the fire water tank fill piping;
- Installation of an onsite foam trailer; and
- Installation of foam/water injectors and associated piping and electrical components.

Fire detection alarms were added to the two 65,000-bbl (10,334-m^3) oil tanks. The alarm consists of a heat-sensitive wire surrounding the perimeter of each oil tank. The alarm is connected to the control room at the EOF, so that Venoco personnel are alerted of a fire at the EMT tanks and can initiate fire response procedures (Santa Barbara County 2002).

Twenty-ton (18-metric ton) SBCFD engines currently use water stored in the 10,000-bbl (1,590-m^3) fire water tank to the west of the oil tanks. A manifold extending from the north side of the tank provides the required Fire Department hose connections. The area where the Fire Department trucks would access the manifold was previously unpaved. Because of the possibility of fire engines becoming stuck in the mud during wet conditions or after responding to a fire at the EMT, SBCFD required a suitable foundation adjacent to the manifold. To satisfy SBCFD requirements on this issue, Venoco constructed a paved access driveway off their existing paved facility access road (Santa Barbara County 2002).

Modification of the existing fire water tank manifold involved relocating the manifold approximately 30 feet (9 m) east of its previous location and providing new Fire Department connections. New piping was needed between the existing and proposed locations of the manifold (Santa Barbara County 2002).

An inspection of the fire water tank noted holes in and thinning of the upper portions of the 3-ring, 10,000-bbl (1,590-m^3) bolted steel tank. Venoco replaced the uppermost of the three rings and repaired the middle ring. The netting that rests on the top of the fire water tank to prevent leaves, birds, and other materials from entering the tank was

replaced. Venoco added a level control switch that automatically initiates filling of the tank when the tank is less than 88 percent full and automatically ceases filling once the tank's volume reaches 94 percent of its capacity. Venoco also installed high- and low-level alarms that notify operators at the EOF when the tank's volume reaches 96 percent of its capacity or falls below 84 percent. The switch and alarms are activated by a float resting on the water surface inside the tank (Santa Barbara County 2002).

The current 2-inch-diameter (5-centimeter [cm]) Goleta Water District line that serves the fire water tank had one or more leaks. The leaks were located in the last 300 feet (91 m) of the piping, likely in the vicinity of the vernal marsh just northwest of the fire water tank. Venoco replaced the leaky segment with a new 2-inch-diameter (5-cm) line. The previous leaky segment was taken out of service and temporarily abandoned in place, since removal would have involved trenching through the vernal marsh. Final disposition of the line will be determined at the end of the EMT lease life when all facility components are removed and the area is restored (Santa Barbara County 2002).

A 7-foot (2-m) by 10-foot (3-m) foam trailer was stationed at the EMT alongside the tank containment berms. The trailer provides a connection manifold for the water pumped from the Fire Department engines and contains a 1,200-gallon (5-m^3) foam concentrate storage tank, foam making equipment, and a monitor for the surface application of foam (Santa Barbara County 2002).

The final component was the installation of fixed foam injection systems at both crude oil storage tanks. Two injection points exist for each tank, one on the western half of each tank, and the other on the eastern half. A set of new 6-inch-diameter (15-cm) pipe runs from the foam trailer to each tank and connects into the tanks with new 6-inch-diameter (15-cm) valves. Selective valves along each set of piping direct the foam/water mixture into either tank or both tanks. Check valves were installed at the end of each pipeline segment to prevent oil from the tanks from flowing back through the lines toward the foam trailer. The four injection points are approximately 2 to 3 feet (1 m) above the base of the tanks (Santa Barbara County 2002).

Two sets of new 6-inch-diameter (15-cm) piping were installed. The first set runs from the foam trailer, along the containment berm between the two tanks, to the nozzle at the western injection points of each tank. The length of new piping for the western injection points totals approximately 500 feet (152 m). The second piping section is approximately 300 feet (91 m) long and runs from the trailer to the tie-in points on the

western sides of the tanks. All new piping is above ground, and supported on new prefabricated concrete sleepers at 14-foot (4-m) intervals (Santa Barbara County 2002).

The injection points were installed with hot taps into the tank walls. Hot tap procedures provide tie-in capabilities while not affecting the operation of the EMT (Santa Barbara County 2002).

All the upgrades have been completed and the Fire Department approved the required upgrades in January 2006.

4.8.2 Regulatory Setting

Fire protection systems associated with the Project must be detailed in the fire protection plan and include systems and designs that ensure compliance with a range of codes and standards. A number of Federal, State, and local laws that regulate marine terminals, vessels, and pipelines also have implications for fire protection and emergency response. Please refer to Section 4.2.2, Hazards and Hazardous Materials, for a complete description of these requirements.

Federal

Federal regulations directly applicable to fire protection and emergency response issues include:

- Title 29, Labor, of the Code of Federal Regulations (CFR) 1910.38, Emergency Action Plans;
- 29 CFR 1910.39, Fire Prevention Plans; and
- 29 CFR 1910.155, Subpart L, Fire Protection.

State

The California State Fire Marshal has responsibility for the safety of all intrastate hazardous liquid pipelines and all interstate pipelines used for the transportation of hazardous or highly volatile liquid substances. The State Fire Marshal develops regulations relating to fire and life safety under Title 19, Public Safety, of the California Code of Regulations (CCR). These regulations have been prepared and adopted for the purpose of establishing minimum standards for the prevention of fire and for the

protection of life and property against fire, explosion, and panic. The State Fire Marshal also adopts and administers the regulations and standards considered necessary under the California Health and Safety Code to protect life and property, including section 13160, Portable Fire Extinguishers, and section 13195, Automatic Fire Extinguishers Systems (California Office of the State Fire Marshal 2005).

Local

Santa Barbara County has a number of requirements governing fire protection and emergency response at the EMT.

- Santa Barbara County Code Chapter 15, Amendments to the Uniform Fire Code;
- SBCFD Standard 2A, Fire Protection Water Regulations Flows and Hydrant Spacing;
- SBCFD Standard 3, Fire Protection Hazard Area Requirements;
- SBCFD Standard 6, Hazardous Materials Conditions;
- SBCFD Standard 7, Alarms & Signaling Systems;
- SBCFD, Evacuation Near Flammable or Combustible Pipeline;
- Santa Barbara County Permit Conditions, Various;
- Santa Barbara County Public Works Engineering Design Standards, Roadways; and
- Santa Barbara County Ordinance 2919 [95-DP-024] (Venoco, Inc.'s Operating Permit for the EOF and the EMT).

Other Recognized Codes and Standards

Other codes and standards are specified by the American National Standards Institute (ANSI), American Petroleum Institute (API), Industrial Risk Insurers (IRI), National Fire Protection Association (NFPA), and Uniform Fire Code (UFC) (see Table 4.8-1).

Table 4.8-1
Applicable Standards and Codes

Code/Standard	Description
ANSI B31.4	Liquid Petroleum Transportation Piping Systems
API RP 500	Classification of Hazardous Areas in Petroleum Pipeline Facilities
API Pub 2004	Inspection for Fire Protection
IRI IM.2.5.2	Plant Layout and Spacing for Oil and Chemical Plants
IRI IM 17.3.3	Guiding Principles For Loss Prevention and Protection of Crude Oil and Petroleum Products Pumping Stations
IRI IM 17.3.4	Guiding Principles For Loss Prevention and Protection of Crude Oil and Petroleum Products Storage Terminals
NFPA 11	Low Expansion Foam and Combined Agent Systems
NFPA 12	A&B Halogenated Extinguishing Agent Systems
NFPA 15	Water Spray Fixed Systems
NFPA 20	Centrifugal Fire Pumps;
NFPA 22	Water Tanks for Private Fire Protection
NFPA 24	Installation of Private Fire Service Mains and Their Appurtenances
NFPA 25	Inspection, Testing and Maintenance of Water-Based Fire Protection Systems
NFPA 30	Flammable and Combustible Liquids Code
NFPA 70	National Electric Code
UFC Article 02, Division II	Special Procedures
UFC Article 04	Permitting
UFC Article 09	Definitions and Abbreviations
UFC Article 10	Fire Protection
UFC Article 11	General Precautions Against Fire
UFC Article 12	Maintenance of Exits and Occupant Load Control
UFC Article 13	Smoking
UFC Article 14	Fire Alarm Systems
UFC Article 49	Welding and Cutting
UFC Article 79	Flammable and Combustible Liquids
UFC Article 80	Hazardous Materials
UFC Article 85	Electrical Systems

4.8.3 Significance Criteria

Impacts to fire protection and emergency response services would be considered significant if:

- Continued operation of the Project creates the need for one or more additional employees to maintain the current level of fire protection and emergency response services;

- The Project results in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain the current level of fire protection and emergency response services;

- The Project is located more than 10 miles (16 km) or 15 minutes from an emergency response location with fire fighting and spill response capabilities;

- Accessibility to the project site is difficult or limited; or

- The Project does not have an approved fire protection or emergency response plan.

4.8.4 Impact Analysis And Mitigation

As detailed above, the EMT must meet a number of Federal, State, and local requirements relating to fire protection and emergency response. The SBCFD and OES, in addition to other agencies, conduct an annual operational and safety inspection of the EMT facilities. As a result of a recent inspection, the EMT's fire suppression system has been upgraded to meet current standards.

The OES has reviewed the proposed Project and its impact on current fire protection and emergency response staffing levels and has determined that current staffing levels are adequate (Arndt 2005). The proposed Project is located approximately 1 mile (1.6 km) from Station 11, the accessibility to the site has been upgraded per the SBCFD's requirements, and Venoco's Fire Prevention and Preparedness Plan, OSCP and EAP have been reviewed and deemed adequate by the regulating agencies. Therefore, the proposed Project would not have an impact on publicly provided fire protection and emergency response services.

4.8.5 Impacts Of Alternatives

No Project Alternative

Under the No Project Alternative, Venoco's lease would not be renewed and the existing marine terminal would be subsequently decommissioned with its components abandoned in place, removed, or a combination thereof. The decommissioning of the marine terminal would be governed by an Abandonment and Restoration Plan, a copy of which has been submitted to the CSLC, Santa Barbara County, and the city of Goleta as a component of Venoco's "Development Plan Application for Ellwood Oil Pipeline Installation and Field Improvements" (Venoco 2005). Under the No Project Alternative, an alternative means of crude oil transportation would either need to be in place prior to decommissioning of the EMT or production at Platform Holly would cease. A consequence of the absence of the EMT and alternative crude oil transportation methods would be that the petroleum resources associated with the South Ellwood Field would be stranded, at least temporarily. It is more likely, however, that under the No Project Alternative, Venoco would pursue alternative means of traditional crude oil transportation such as truck transportation or a pipeline. For purposes of this EIR, it has been assumed that the No Project Alternative would result in a decommissioning schedule that would consider implementation of one of the described transportation options. Any future crude oil transportation option would be the subject of a subsequent application to the CSLC, city of Goleta, or Santa Barbara County, depending on the proposed option. As a result, impacts to publicly provided fire protection and emergency response services would occur as with the existing operations until the EMT facilities are shut down.

Truck Transportation

If this method of crude oil transportation is selected, the produced oil would be shipped via trucks from the EOF to the Venoco Carpinteria Oil and Gas Processing Facility (Venoco Carpinteria Facility) instead of being shipped by barge through the EMT.

A truck loading rack would be constructed at the EOF to accommodate the necessary truck loading requirements. A truck unloading rack would be required at the Venoco Carpinteria Facility to transfer crude oil from the truck to an existing storage tank at the facility. The crude oil would be co-mingled with production from the Venoco Carpinteria Facility and transported via pipeline to Los Angeles area refineries.

This option would reduce the risk of fire or explosion at the EMT but would increase the risk of accidents from truck transport along public roads. As discussed in Section 4.2, Hazards and Hazardous Materials, the risk from truck accidents would increase, but would not be expected to negatively affect publicly provided fire protection and emergency response services.

Pipeline Transportation

This method of crude oil transportation would involve the construction of an onshore 10-inch-diameter (25.4-cm) crude oil pipeline from the EOF to the Plains All American Pipeline (AAPL) at Las Flores Canyon. The proposed 10-inch-diameter (25.4-cm) pipeline would cross under Highway 101 near the EOF and run parallel to the north side of the highway for approximately 10 miles (16 km) to Las Flores Canyon. At Las Flores Canyon, the pipeline would run a short distance up the canyon to the AAPL pipeline pump station that is located at the ExxonMobil Santa Ynez Unit (SYU) oil and gas processing facility. The Venoco Pipeline would tie in directly to the AAPL and would not utilize any of the ExxonMobil SYU storage tanks. The pipeline would be installed along Calle Real, which runs parallel to Highway 101 north of the highway. Since Calle Real does not run the entire length of the proposed pipeline route, the pipeline would also cross a few stretches of private ranch/agricultural roads that parallel Highway 101.

As described in Section 4.2, Hazards and Hazardous Materials, this method of crude oil transportation would result in lowered risks of fire and explosion. Therefore, no impact to publicly provided fire protection and emergency response services would be expected.

4.8.6 Cumulative Projects Impact Analysis

While the effect of increased residential and commercial development in the project area has cumulatively affected the SBCFD, the proposed Project would not have an impact on publicly provided fire protection and emergency response services, and therefore, does not contribute to cumulative impacts.

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